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*NOT ADMITTED TO THE NEW YORK BAR

So Ordered.

Alvin K. Hellerstein
10-17-2023

October 16, 2023

VIA ECF

Honorable Alvin K. Hellerstein
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Victor Molina Rodriguez*,
Case No. 22-CR-632-AKH

Dear Judge Hellerstein:

We represent defendant Victor Molina Rodriguez in the above-captioned case. We intend to file a sentencing submission this Wednesday, October 18, 2023, ahead of Mr. Molina Rodriguez's sentencing on November 1, 2023. We write with the Government's consent to respectfully request the Court's permission to submit portions of our sentencing submission under seal.

Our submission includes sensitive personal information, including third parties' financial and medical information of the sort that courts typically permit to be filed under seal. *See United States v. King*, No. 10-CR-122 (JGK), 2012 WL 2196674, at *2-3

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Honorable Alvin K. Hellerstein

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(S.D.N.Y. June 15, 2012) (“The need to protect the privacy of [] third parties is a compelling one, which overrides any public interest in the disclosure of these materials because such materials are truly tangential to the sentencing decision in this case.”) (omitting internal citations). Additionally, our submission attaches a number of letters from Mr. Molina Rodriguez’s friends and family members, containing similar information.

We are available to answer any questions, and thank you for your consideration of this request.


Respectfully submitted,

/s/ Samantha Fry

Samantha Fry

cc: Roberto Finzi
AUSA Matthew Shahabian and AUSA Jane Chong

The application to file defendant Victor Molina Rodriguez’s sentencing submission under seal is granted.
SO ORDERED.


Alvin K. Hellerstein, U.S.D.J.